

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

RAJU MEGANATHAN, et al.,  
*Plaintiffs*

v.

SIGNAL INTERNATIONAL, L.L.C., et al.,  
*Defendants*

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Civil Action No.  
1:13-cv-00497-MAC-ZJH

**STATUS REPORT**

Plaintiffs and Signal International, LLC, and certain of its affiliates (the “Signal Entities”), in accordance with the Court’s Order Staying Case Pursuant to Bankruptcy [Dkt. No. 335] requiring the parties to file a notice every 120 days informing the Court of the status of the Signal bankruptcy proceedings, hereby file this Status Report as of November 12, 2015.

The Signal Entities filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code on July 12, 2015. *In re Signal Int’l, Inc., et al.*, No. 15-11498 (Bankr. D. Del. July 12, 2015).<sup>1</sup> Prior to the Signal Entities’ bankruptcy filings, the Plaintiffs, the Signal Entities, and certain other civil plaintiffs entered into a certain plan support agreement (the “PSA”), which contemplates, among other things, a settlement of the Plaintiffs’ claims against the Signal Entities through a consensual chapter 11 plan proposed by the Signal Entities. The bankruptcy court authorized the Signal Entities to assume the PSA by order dated September 1, 2015. *In re Signal Int’l, Inc.*, No. 15-11498 (Bankr. D. Del. Sept. 1, 2015), ECF No. 279. The

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<sup>1</sup> The other entities are: *Signal Ship Repair, LLC* (Case No. 15-11499), *Signal Int’l, LLC* (Case No. 15-11500), *Signal Int’l Texas GP, LLC* (Case No. 15-11501), and *Signal Int’l Texas, L.P.* (Case No. 15-11502). By the bankruptcy court’s order, all five cases are being jointly administered with the *Signal Int’l, Inc.* case. *In re Signal Int’l, Inc.*, No. 15-11498 (Bankr. D. Del. July 14, 2015), ECF No. 55.

Signal Entities subsequently proposed a plan of liquidation consistent with the PSA. The proposed plan contemplates the sale of substantially all of the Signal Entities' assets to the highest bidder. A hearing on confirmation of the liquidation plan is scheduled for November 24, 2015. Further, no competing bids were received for the purchase of Signal's assets and, therefore, pending court approval, its assets will be sold to Signal's pre-petition lender.

In light of the Signal Entities' ongoing bankruptcy cases, Plaintiffs respectfully request that the stay remain in effect. Pursuant to the Court's Order on July 14, 2015 [Dkt .No. 335], the parties will file a further status update in 120 days. On November 11, Plaintiffs communicated the terms of this status update to counsel for the Signal Entities, Sachin Dewan, and Malvern Burnett. Although Signal Entities joined the notice, Plaintiffs did not hear back from counsel for Messrs. Burnett or Dewan.

Respectfully submitted, this 12th day of November, 2015.

/s/ Timothy H. Birnbaum  
**DLA Piper LLP (US)**

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2015, I electronically filed the foregoing **Status Report** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all ECF participants.

I further certify that on November 12, 2015, I served a true and correct copy of the foregoing document upon the below-named Defendants by depositing a copy of same in the U.S. Mail, with sufficient postage thereon to insure delivery, and properly addressed as follows:

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/s/ Timothy H. Birnbaum  
Timothy H. Birnbaum